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March 18, 2025

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BY ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corp., et al v. Lighthouse List Company. et al* (No. 1:24-cv-11443-HB)
Joinder in Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaint Under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6)

Dear Judge Bartle:

This firm represents the defendant Lighthouse List Company, LLC ("Lighthouse List") in the above-referenced matter, which is among those cases over which Your Honor is presiding in the District of New Jersey involving a common plaintiff, Atlas Data Privacy Corp., asserting claims under New Jersey's Daniel's Law statute against various defendants.

We write to advise the Court that Lighthouse List hereby joins the motion to dismiss for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2), and the consolidated brief in support, that were filed today on the docket of the case captioned, *Atlas Data Privacy Corporation, et al. v. GoHunt LLC, et al.*, No. 1:24-cv-04380 (D.N.J.) (the "Consolidated 12(b)(2) Motion"). We have signed the Consolidated 12(b)(2) Motion on Lighthouse List's behalf, and the papers make clear to Plaintiffs that the motion is intended to represent the arguments of all the participating defendants in each of their respective cases. In addition, and consistent with this

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Court's January 22, 2025 order (*see* DE 12), Lighthouse List will be filing on the docket of its own case a supplemental brief and accompanying declaration in further support of its motion to dismiss for lack of personal jurisdiction.

Lighthouse List also hereby joins the motion to dismiss for failure to state claim upon which relief can be granted under Federal Rule of Civil Procedure 12(b)(6), and the consolidated brief in support, that were filed today on the docket of the case captioned, *Atlas Data Privacy Corporation, et al. v. DM Group, Inc.* No. 1:24-cv-04075-HB (D.N.J.) (the "Consolidated 12(b)(6) Motion"). As with the Consolidated 12(b)(2) Motion, we have signed the Consolidated 12(b)(6) Motion on Lighthouse List's behalf, and the papers make clear to Plaintiffs that the motion is intended to represent the arguments of all the participating defendants in each of their respective cases.

Accordingly, by this letter, Lighthouse List notes for the record on the docket of this case that it considers the arguments raised in the Consolidated 12(b)(2) Motion, the Consolidated 12(b)(6) Motion, and the associated briefs, to constitute its arguments for dismissal of the operative complaint in this action. Should further action be required by Lighthouse List or its counsel to seek that relief in this case, we stand ready to proceed as the Court may direct.

Respectfully submitted,
STARR, GERN, DAVISON & RUBIN, P.C.

/s/ Ronald L. Davison
Ronald L. Davison, Esq.

cc: All Counsel of Record (Via ECF)